

1 [Firm Name and address]

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5 Attorneys for defendants B and C

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UNITED STATES DISTRICT COURT

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CENTRAL DISTRICT OF CALIFORNIA

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14 PLAINTIFFS 1, 2, AND 3, ) Case No. \*\*CV 01\*-\*\*\*\*-\*\*\* (\*\*x)

15 Plaintiffs, ) JOINT STIPULATION ON MOTION OF

16 v. ) DEFENDANT C TO COMPEL PLAINTIFF 2

17 DEFENDANTS A, B, AND C, ) TO ANSWER INTERROGATORIES 9, 17,

18 Defendants. ) AND 21-23

19 \_\_\_\_\_ ) Hearing Date: \_\_\_\_\_

20 ) Time: \_\_\_\_\_

21 ) Place: Courtroom 6B

22 ) Before Magistrate Judge Nakazato

23 )

24 )

25 )

26 )

27 )

28 )

Defendant C's Introduction:

[State only enough about the case so that it will be reasonably apparent why the particular discovery sought in the interrogatories is needed to litigate the case.]

[Avoid argument, hyperbole, and attempts to evoke sympathy.]

[Leave out statements about meeting and conferring unless opposing party refused to meet. It is assumed that counsel did meet and confer.]

1 Plaintiff 2's Introduction.

2 [If you agree with above, simply say so. Otherwise, correct any  
3 erroneous statements and add any additional information that is  
4 needed to understand what the case is about that is not clear from  
5 the above and is needed to understand the general context of your  
6 resistance to the discovery.]

7 [If there are inconsistent statements between defendant's  
8 introduction and plaintiff's introduction, a declaration is necessary  
9 to prove the point. The Court will not assume one attorney is  
10 correct and the other is not.]

11 The Interrogatories in Issue:

12 Interrogatory 9 from defendant C to plaintiff 2:

13 [Quote interrogatory as served. If parties agreed at the meet-  
14 and-confer to construe certain language in the interrogatory, the  
15 agreed-upon construction should follow the interrogatory.]

16 Plaintiff 2's response to Interrogatory 9:

17 [Quote response as served.]

18 Defendant C's contentions:

19 "Defendant C offered at the meet-and-confer to resolve the  
20 dispute over the interrogatory by \_\_\_\_\_."

21 [State contentions and legal authorities why the information sought  
22 is discoverable.]

23 Plaintiff 2's contentions:

24 "Plaintiff 2 offered at the meet-and-confer to resolve the  
25 dispute over this interrogatory by \_\_\_\_\_."

26 The interrogatory is objectionable because: [contentions]

27 [If undue burden or the like is contended, a declaration must  
28 be attached quantifying the expected burden.]

1 Interrogatory 17 from defendant C to plaintiff 2:

2 [Same format as above.]

3 Interrogatory 21 from defendant C to plaintiff 2:

4 [Same format as above.]

5 Interrogatory 22 from defendant C to plaintiff 2:

6 [Same format as above.]

7 Interrogatory 23 from defendant C to plaintiff 2:

8 [Same format as above.]

9 Defendant C's conclusion:

10 Plaintiff 2 should be ordered to respond forthwith, without  
11 objections, to interrogatories 9, 17, and 21-23.

12 Plaintiff 2's conclusion:

13 Defendant C's motion should be denied.

14 Alternatively, plaintiff 2 should not be compelled to respond  
15 beyond what it offered at the meet-and-confer and it should be  
16 permitted at least 10 days to gather the information.

17 Respectfully submitted,

18 [Dated:]

[FIRM NAME]

19

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By: \_\_\_\_\_

21

Attorney  
Attorneys for defendants B and C

22 [Dated:]

[FIRM NAME]

23

24

By: \_\_\_\_\_

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Attorney  
Attorneys plaintiff 2

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